

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD. and
LG.PHILIPS LCD AMERICA, INC.,

Plaintiff,

vs.

AU OPTRONICS CORPORATION;
AU OPTRONICS CORPORATION
AMERICA; CHI MEI OPTOELECTRONICS
CORPORATION; and CHI MEI
OPTOELECTRONICS USA, INC.,

Defendants.

Civil Action No. 06-726-GMS

AU OPTRONICS CORPORATION,

Plaintiff,

vs.

LG.PHILIPS LCD CO., LTD. and
LG.PHILIPS LCD AMERICA, INC.,

Defendants.

Civil Action No. 07-357-GMS

CONSOLIDATED CASES

JURY TRIAL DEMANDED

**AU OPTRONICS CORPORATION'S REPLY TO LG.PHILIPS LCD CO. LTD.'S
ADDITIONAL COUNTERCLAIMS**

Plaintiff AU OPTRONICS CORPORATION ("AUO") hereby replies to LG.Philips
LCD Co., Ltd.'s ("LPL") counterclaims filed on or on about September 14, 2007 (D.I. 138).

REPLY TO COUNTERCLAIMS

38. With regard to paragraph 38, AUO denies that LPL is entitled to any relief by
virtue of its counterclaims.

39. AUO is without sufficient knowledge or information to form a belief as to the
truth of the allegations in paragraph 39 and therefore denies them.

40. With regard to paragraph 40, AUO admits that it is a Taiwanese corporation, and it has a place of business at No. 1, LI-Hsin Road 2, Hsinchu Science Park, Hsinchu Taiwan, ROC.

41. With regard to paragraph 41, AUO admits that LPL's Counterclaims purport to set forth claims arising under the patent laws of the United States (Title 35 of the United States Code).

42. With regard to paragraph 42, AUO admits that LPL's Counterclaims purport to set forth a declaratory judgment claim under 28 U.S.C. §§ 2201 and 2202, and under the patent laws of the United States (Title 35 of the United States Code). AUO is without sufficient knowledge or information to form a belief as to the truth of the remaining allegations and therefore denies them.

43. AUO understands that paragraph 43 references LPL's declaratory claims with respect to patent infringement, and on that basis, subject matter jurisdiction is proper over LPL's patent infringement claims against AUO under 28 U.S.C. § 1331 and 1338(a).

44. With regard to paragraph 44, AUO denies that this Court has personal jurisdiction over AUO, and further denies that this Court has venue over AUO.

45. With regard to paragraph 45, AUO is the owner of all rights, title, and interest in and to the '069 Patent and the '266 Patent (the "AUO Patents").

**RESPONSE TO COUNTERCLAIM COUNT XII
CLAIM FOR DECLATORY JUDGMENT OF INVALIDITY OF
THE '069 PATENT AND THE '266 PATENT**

46. AUO hereby refers to and incorporates herein its responses to paragraphs 38 – 45.

47. With regard to paragraph 47, AUO admits that it filed counterclaims for patent infringement in this action and that there is substantial controversy between the parties having adverse legal interests.

48. AUO denies the allegations in paragraph 48.

49. AUO denies the allegations in paragraph 49.

50. With regard to paragraph 50, AUO admits that it has asserted the AUO Patents against LPL. The remaining allegations are legal assertions to which no answer or response is required.

**RESPONSE TO COUNTERCLAIM COUNT X
CLAIM FOR DECLATORY JUDGMENT OF NON-INFRINGEMENT OF
THE '069 PATENT AND THE '266 PATENT**

51. AUO hereby refers to and incorporates herein its responses to paragraphs 38 –
50.

52. AUO denies the allegations in paragraph 52.

53. AUO denies the allegations in paragraph 53.

54. With regard to paragraph 54, AUO admits that it has asserted the AUO Patents against LPL. The remaining allegations are legal assertions to which no answer or response is required.

RESPONSE TO PRAYER FOR RELIEF

As to paragraphs A through E of the Prayer for Relief, AUO denies that LPL is entitled to the requested relief.

September 28, 2007

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/s/ Karen L. Pascale

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CERTIFICATE OF SERVICE

I, Karen L. Pascale, Esquire, hereby certify that on September 28, 2007, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

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I further certify that I caused a copy of the foregoing document to be served by e-mail and hand delivery on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

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